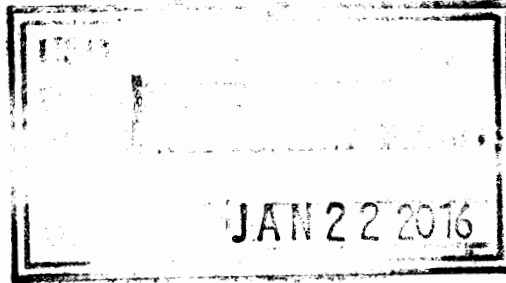


# Locke Lord<sup>LLP</sup>

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January 21, 2016

**Via Hand-Delivery & Fax (212) 805-6737**

Hon. George B. Daniels  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, New York 10007-1312

**SO ORDERED:**

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: JAN 22 2016

Re: *Sonterra Capital Master Fund et al. v. UBS AG et al.*, No. 1:15-cv-5844 GBD

Dear Judge Daniels:

We represent the HSBC Defendants in the above-referenced action. We write on behalf of all non-settling Defendants that have appeared in this action to request the Court's approval of page limits for Defendants' forthcoming response to Plaintiffs' Amended Class Action Complaint [Dkt. No. 122]. The response is due on or by February 1, 2016. Plaintiffs' counsel has been consulted and does not oppose this request.

**Background**

Defendants require more pages than the Court's normal 25 page limit because there are over 40 Defendants in this case who are attempting to prepare a single response brief on the merits, and two separate responsive briefs on personal jurisdiction objections - one brief for the Japanese banks, and one brief for the non-Japanese banks, all in response to an Amended Complaint consisting of 451 pages plus more than 40 exhibits.<sup>1</sup>

**Proposed Agreement**

Defendants propose, and counsel for Plaintiffs consent, to the following briefing plan and page limits in connection with the upcoming motion to dismiss briefs:

1. Defendants will file a combined brief not exceeding 35 pages that addresses common issues on the substance of Plaintiffs' claims.
2. The Japanese Bank Defendants will file a combined brief not exceeding 25 pages that addresses personal jurisdiction objections by those Banks.

<sup>1</sup> The pages requested on initial briefing and for personal jurisdiction objections are consistent with those the Court previously permitted in the *Laydon v. Mizuho Bank, Ltd. et al.*, No. 1:12-cv-03419-GBD action

Hon. George B. Daniels  
January 21, 2016  
Page 2

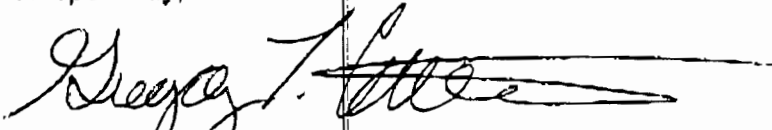
3. The Non-Japanese Bank Defendants will file a combined brief not exceeding 25 pages that addresses personal jurisdiction objections by those Banks.

4. The parties understand that certain Defendants may file short, separate briefs in support of their motions to dismiss for lack of personal jurisdiction or other discrete, individual issues. Such briefs will comply with the Court's rules on page limits.

5. Page limits for Plaintiffs' response briefs and Defendants' reply briefs will be set at a later date.

We would appreciate your review and endorsement of approval of the briefing proposal set forth above. Thank you for your attention to this letter. If you have any questions or need anything further, please let me know.

Respectfully,

A handwritten signature in black ink, appearing to read "Gregory T. Casamento", with a long horizontal line extending to the right.

Gregory T. Casamento  
Counsel for HSBC Defendants

cc: All Counsel of Record (by email)